

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: TERRORIST ATTACKS ON SEPTEMBER 11, 2001      03 MDL 1570 (RCC)  
ECF Case

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*This document relates to:*

<u>Burnett v. Al Baraka Inv. &amp; Dev. Corp.</u>	02 Civ. 1616 (RCC)
<u>Ashton v. al Qaeda Islamic Army</u>	02 Civ. 6977 (RCC)
<u>Federal Insurance v. al Qaida</u>	03 Civ. 6978 (RCC)
<u>In re: Terror Attacks on September 11, 2001</u>	03 MDL 1570 (RCC)

**NOTICE OF MOTION**  
**FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD**

PLEASE TAKE NOTICE, that upon the annexed Affirmation of Christopher R. Smith, Esq., sworn to on March 31, 2005, Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization will respectfully move this Court, at the United States District Courthouse for the Southern District of New York, 500 Pearl Street, New York, New York 10007, for entry of an Order pursuant to Local Rule 1.4, relieving Stephanie W. Fell as attorney of record in the above-referenced the matters.

Dated: Washington, DC  
March 31, 2005

Respectfully submitted,

MARTIN MCMAHON & ASSOCIATES  
*Attorneys for Defendants Al Baraka Investment &  
Development Corp., Saleh Abdullah Kamel, Omar*

*Abdullah Kamel, Rabita Trust, Wa'el Julaidan,  
Muslim World League, International Islamic Relief  
Organization*

By: \_\_\_\_\_/s/\_\_\_\_\_

CHRISTOPHER R. SMITH

1150 Connecticut Avenue, N.W.

Suite 900

Washington, DC 20036

(202)862-4343

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**AFFIRMATION IN SUPPORT OF MOTION  
FOR LEAVE TO WITHDRAW AS COUNSEL OF RECORD**

CHRISTOPHER R. SMITH, an attorney at law admitted Pro Hac Vice before the United States District Court for the Southern District of New York, affirms as follows under the penalties of perjury:

1. I am associated with the law firm of Martin McMahon & Associates, 1150 Connecticut Avenue, N.W., Suite 900, Washington, DC 20036, one of the attorneys of record for Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization in the above-captioned consolidated actions.
2. I am fully familiar with the facts and circumstances as set forth herein and make this Affirmation in support of Martin McMahon & Associates' application to relieve Stephanie W. Fell as one of the attorneys of record for

Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization in the above-captioned consolidated actions.

3. Stephanie W. Fell is no longer affiliated with Martin McMahon & Associates.
4. For the foregoing reasons, the undersigned respectfully requests that this Court grant Martin McMahon & Associates leave to relieve Stephanie W. Fell as one of the attorneys of record for Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization in the above-captioned consolidated actions.
5. I certify that all of the foregoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: Washington, DC  
March 31, 2005

Respectfully submitted,

MARTIN MCMAHON & ASSOCIATES

*Attorneys for Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization*

By: \_\_\_\_\_/s/\_\_\_\_\_

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**ORDER**

This matter came before the Court on Motion by Martin McMahon & Associates to remove Stephanie W. Fell as one of the attorneys for Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization in all actions, and good cause being shown.

Based upon the Motion by Martin McMahon & Associates and any response thereto, it is hereby ORDERED that Stephanie W. Fell is relieved as one of the attorneys of record for Defendants Al Baraka Investment & Development Corp., Saleh Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization in all actions.

It is FURTHER ORDERED that appearances of Martin F. McMahon and Christopher R. Smith for Defendants Al Baraka Investment & Development Corp., Saleh

Abdullah Kamel, Omar Abdullah Kamel, Rabita Trust, Wa'el Julaidan, Muslim World League, International Islamic Relief Organization will remain unchanged.

ENTERED:

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